

Bond Pearce

Telephone attendance

Client: Royal Mail Group PLC Sub Postmaster Litigation

Matter: Mr Lee Castleton

Matter no: 348035.134

Attending:

Name: Stephen Dilley

Location: N/A

Date: 4 October 2006

Start time:

Units:

ATTENDING (OUT) Carol King – returning her voicemail.

She explained that Ann Farnham could give evidence in place of Ken Crawley. She was willing to sign off the same witness statement that Ken prepared but not to be called to give evidence in court.

She said that she didn't think we could force people to give evidence and I said that was right and that in any event we were not intending to call Ken or Ann but I couldn't guarantee that the other side wouldn't.

I said that I would think about what to do and then come back to her after her imminent meeting.

Thereafter calling Counsel and leaving him a voicemail message to raise this issue and to ask whether we would want to call this sort of witness at all.

12 minutes

Telephone conversation with Richard Morgan. His advice to me was to get Ken Crawley to sign his witness statement. We will then subpoena him if necessary. Explaining to Richard that Ken was still there until December in any case.

Also he wants me to prepare a bundle for the CMC. Agreeing with him that it will be two bundles. In the first folder we will have existing pleadings, orders and the disclosure list. In the second bundle we will have the application notice, draft order, amended pleadings and my witness statement.

He wants this indexed and paginated and me to serve an index on the other side.

12 minutes
SJD